

**THE TEXAS TAXPAYER &
STUDENT FAIRNESS COALITION,
*et al.***

VS.

MICHAEL WILLIAMS, *et al.*

Consolidated Case:

MARIO FLORES, *et al.*

vs.

MICHAEL WILLIAMS, *et al.*

IN THE DISTRICT COURT

OF TRAVIS COUNTY, TEXAS

200TH JUDICIAL DISTRICT

**SECOND SUPPLEMENTAL DEPOSITIONS DESIGNATION BY
TEXAS CHARTER SCHOOLS ASSOCIATION PLAINTIFFS**

The exhibits referenced below supplement the previously filed First Supplemental Master Deposition List submitted by Texas Charter Schools Association Plaintiffs' ("Charter Plaintiffs"). Charter Plaintiffs plan on moving for the admission of same on Monday, January 28, 2013.

Exh. No.	Depositions to be Offered by Charter Plaintiffs	Offer	Obj.	Date Admit	Date Not Admit
9030a	Errata sheet and signature page to oral deposition of Mark DiBella taken on 12/17/12				
9031a	Errata sheet to oral deposition of David Dunn taken on 11/09/12				
9034a	Substitution of Errata sheet page 111d to oral deposition of Denise Pierce taken on 01/04/13				

The Charter Plaintiffs may utilize, at trial, any or all parts of the deposition testimony and deposition exhibits offered by other witnesses, deposition testimony and deposition exhibits marked or included by any party, and data from public records.

Respectfully submitted,

SCHULMAN, LOPEZ & HOFFER, LLP



Robert A. Schulman

Texas Bar No. 17834500

Leonard J. Schwartz

Texas Bar No. 17867000

Joseph E. Hoffer

Texas Bar No. 24049462

517 Soledad Street

San Antonio, Texas 78205-1508

Telephone: (210) 538-5385

Facsimile: (210) 538-5384

Attorneys for Charter Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that on January 24, 2013, a true and correct copy of the foregoing was served upon the following counsel of record *via* e-mail, pursuant to the agreement of the parties, and in compliance with the Texas Rules of Civil Procedure and the Texas Local Rules:

Shelley N. Dahlberg, Eric Vinson, Robin Pearson and Nicole Bunker-Henderson, Texas Attorney General's Office, P. O. Box 12548, Capitol Station, Austin, Texas 78711; **Attorneys for State Defendants;**

Mark R. Trachtenberg, Haynes and Boone, LLP, 1 Houston Center, 1221 McKinney Street, Suite 2100, Houston, Texas 77010; John W. Turner and Lacy M. Lawrence, Haynes and Boone, LLP, 2323 Victory Avenue, Suite 700, Dallas, Texas 75219; **Attorneys for Calhoun County, et al. Plaintiffs;**

David G. Hinojosa, Marisa Bono and Rebecca Couto, Mexican American Legal Defense and Educational Fund, Inc., 110 Broadway, Suite 300, San Antonio, Texas 78205; and Miguel A. Perez Vargas, META, Inc., 240 "A" Elm Street, Suite 22, Somerville, Massachusetts 02144; **Attorneys for Edgewood ISD, et al. Plaintiffs;**

J. Christopher Diamond, The Diamond Law Firm, PC, 17484 Northwest Freeway, Suite 150, Houston, Texas 77040; Craig T. Enoch and Melissa A. Lorber, Enoch Kever, PLLC, 600 Congress, Suite 2800, Austin, Texas 78701; **Attorneys for Efficiency Intervenors;**

J. David Thompson and Philip Fraissinet, Thompson & Horton, LLP, Phoenix Tower, Suite 2000, 3200 Southwest Freeway, Houston, Texas 77027; Holly G. McIntush, Thompson & Horton, LLP, 400 West 15th Street, Suite 1430, Austin, Texas 78701; **Attorneys for Ford Bend ISD, *et al.* Plaintiffs; and**

Richard E. Gray, III, Toni Hunter and Richard Gray, IV, Gray & Becker, PC, 900 West Avenue, Austin, Texas 78701; Randall B. "Buck" Wood and Doug W. Ray, Ray & Wood, 2700 Bee Caves Road, Suite 200, Austin, Texas 78746; **Attorneys for Texas Taxpayer & Student Fairness Coalition, *et al.* Plaintiffs.**



Attorney for Charter School Plaintiffs